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MEETING NOTES

TO: Distribution **DATE:** September 14, 1994
FROM: Philip Nixon **PROJECT:** Solar Pond IM/IRA
MEMO #: SP307:091494.03

ATTENDANCE:

DISTRIBUTION:

Phil Nixon
Harlen Ainscough, CDPHE
Frazer Lockhart, DOE
Steve Howard, DOE/SAIC
Shaleigh Whitesell, PRC
Andy Ledford, EG&G
Tom Broderick, ERM

Arturo Duran, EPA
Randy Ogg, EG&G
Mark Austin, EG&G
Michelle McKee, EG&G
Steve Keith, EG&G
Steve Cooke, EG&G
Toni Forbes, EG&G
R. Popish EG&G (Admin.
Record) (2)
Peg Witherill, DOE/SAIC
Scott Surovchak, DOE
Jeff Ciocco, DOE
Jesse Roberson, DOE
Bob Siegrist, LATO
Alan McGregor, ERM
John Haasbeek, ERM
Marcia Dibiasi, IGO
L. Benson
P. Breen

B. Cropper
K. Cutter
W. Edmonson
T. Evans
H. Heidkamp
R. Henry
M. Hill
P. Holland
S. Hughes
R. McConn
D. Myers
A. Putinsky
R. Stegen
S. Stenseng
R. Schmiermund
B. Glenn
R. Wilkinson
T. Kuykendall
Central Files

SUBJECT: Weekly Status Meeting

1) Review of Meeting Minutes

There were no significant comments on the September 6, 1994 meeting minutes. Therefore, the minutes will be issued without any significant modifications to the draft.

2) Strategy for Public Involvement

Shaleigh Whitesell indicated that Arturo Duran directed her to inform the DOE that the EPA's public relations staff was available to create a strategy for how to best involve the public in the IM/IRA process. It was discussed that the community relations and public relations specialists from the DOE, EG&G, EPA, and CDPHE should meet to discuss the public involvement strategy. **Andy Ledford will initiate a meeting between the groups.** Shaleigh Whitesell stated that Arturo Duran indicated that a meeting should be held with the Jefferson County representatives to inform them that sludge will be proposed for consolidation beneath the engineered cover as a component of the IM/IRA closure. Frazer Lockhart agreed that the Jefferson County representatives should be informed of the recent changes. He stated that the last meeting was held strictly among the EPA, CDPHE, and Jefferson County. Mr. Lockhart requested that the CDPHE and EPA determine how the second briefing should be structured and stated that the DOE would support the agencies if necessary or requested.

Frazer Lockhart reported that the Citizens Advisory Board (CAB) was developed as the voice of the public. The CAB meetings are open to the public and are well advertised. Frazer Lockhart questioned the need to specifically target groups for information dissemination because the CAB is largely performing this activity. Mr. Lockhart said that it is easier to respond to groups that request information or presentations. Requests for information have come to the DOE as a result of CAB meetings. It was noted that there would be a full site tour of the OU4 Solar Evaporation Pond area for CAB members which is tentatively scheduled for October 11, 1994.

It was discussed that ES and EG&G are working on a conceptual excavation plan and a strategy to suppress dust emissions to provide information to the Technical Review Group. In addition, a monitoring plan is also being conceptually designed for the construction activities. The information will be available for a DOE briefing during the week of September 23, 1994.

Frazer Lockhart stated that he would provide a summary of information to the Technical Review Group from the slurry wall report that was prepared by ES. Mr. Lockhart noted that the DOE has decided not to continue evaluation of the slurry wall alternative because there are enough uncertainties surrounding its design and effectiveness to justify not spending the additional time and money to develop the concept to the next level. Mr. Lockhart agreed that the EPA/PRC comments were accurate, but stated that the analysis was intended to screen the slurry wall alternative to determine if it was reasonably certain that it could be installed in an effective manner, and that it had significant benefits over the baseline subsurface drain. Frazer Lockhart stated that the DOE considered the slurry wall potentially feasible but it did not guarantee

significant benefits over the subsurface drain, and would be difficult to implement according to the schedule that the working group was trying to achieve.

3) Submittal of the September 12, 1994 IAG Secondary Deliverable

Phil Nixon provided the team with the responses to the CDPHE and EPA/PRC comments on the draft IM/IRA-EA Decision Document and a synopsis of how the document will change to include sludge as a component of the IM/IRA. It was noted that the summary of the dispute resolution reevaluation results was provided at the August 23, 1994 team meeting.

Andy Ledford stated that DOE, EG&G, and ES would present a technical synopsis of the changes that would be made to the IM/IRA-EA Decision Document so that the CDPHE and EPA could see the new text that would be integrated into the proposed IM/IRA-EA Decision Document. This strategy was suggested to reduce the amount of review time that the agencies would require prior to submitting the proposed IM/IRA-EA Decision Document for public review.

4) Planning/Negotiating Revised IAG Milestones

Andy Ledford submitted two schedules for review and comparison. The first schedule was a synopsis of the original streamlined schedule that was negotiated in September 1993 to expedite the OU4 IM/IRA. The second schedule presented a revised time line modifying the original schedule to include the delays which have occurred throughout the project, and to include extended agency review periods for future submittals of the IM/IRA-EA Decision Document. The revised time line showed that the new approval date for the IM/IRA-EA Decision Document would be January 1996 as compared to November 1994 as originally proposed.

Frazer Lockhart stated that the working team signed up to expedite the project. There has been a schedule slip of approximately 60 days throughout the year. Mr. Lockhart indicated that the working team either has to re-group and work harder to maintain the expedited schedule, or create a realistic schedule which is reflective of typical IM/IRA projects. Harlen Ainscough stated that the CDPHE no longer wished to expedite the document review periods because the OU4 IM/IRA-EA Decision Document has become a large multi-volume document, which requires the typical IM/IRA review period to perform a quality review.

Harlen Ainscough reported that it will be difficult to construct an accurate schedule for submitting the proposed IM/IRA-EA Decision Document for public review until the CDPHE issues a Corrective Action Management Unit (CAMU) decision, in conjunction with the DOE's submittal. The original strategy was for CDPHE to issue a level three permit modification request (for an OU4 CAMU) for public review at the same time that the proposed IM/IRA-EA Decision Document was issued for public review. This would inform the public that the CDPHE supported the CAMU request that DOE included in the IM/IRA-EA Decision Document. Harlen Ainscough indicated that CDPHE management was not ready to support the

CAMU concept at OU4. Mr. Ainscough continued that the CDPHE lawyers consider the CAMU a relaxation of the regulations, and that the CDPHE does not have to compromise their regulations. Frazer Lockhart stated that the CDPHE had promulgated the CAMU concept in Colorado, and they would have to address the issue when a facility formally requested that one be established. Mr. Lockhart continued that the CDPHE would be required to evaluate the DOE's request for a CAMU and make a technical determination with respect to the seven CAMU justification criteria. Mr. Lockhart also stated that the CDPHE, as a member of the Working Group, had agreed that the appropriate strategy for OU4 remediation should include a CAMU and that development of the remediation planning should assume promulgation of regulations allowing a CAMU by the State of Colorado. It was noted that the CAMU concept is a fundamental building block to the IM/IRA-EA Decision Document. Harlen Ainscough suggested that CDPHE management be involved in further discussions concerning the CAMU concept. Mr. Lockhart stated that the DOE is of the opinion that the CDPHE has previously stated that the only substantive barrier to establishment of a CAMU at OU4 was promulgation of the regulation, and that, since the regulation is now in place, establishment of the CAMU should not be an issue.

It was determined that the working group would review the schedule and the topic would be discussed further at the next working group meeting. It was agreed that the working group would develop and mutually agree upon the revised IAG milestone schedule.

5) Annexation of IHSS 176 by OU4

Harlen Ainscough indicated that the CDPHE was concerned that new contaminants of concern (COCs) may be encountered if IHSS 176 were annexed. Phil Nixon responded that the volume of IHSS 176 soil is a small fraction with respect to the volume of OU4 soils. Therefore, the introduction of new COCs would be insignificant. Surface soil sampling indicated that the IHSS 176 soils contained some organic contaminants. Most of these contaminants were similar to those detected in OU4. The IHSS 176 area beneath the engineered cover would be excavated so that the subsurface drain could be installed for groundwater protection. Phil Nixon stated that all of the excavated IHSS 176 soils will be consolidated beneath the engineered cover.

Harlen Ainscough asked if the Phase II program would characterize the IHSS 176 soils as mentioned in the DOE letter requesting that IHSS 176 be annexed by OU4. DOE/EG&G will review the letter requesting the annexation and provide a characterization interpretation at the next team meeting.

6) Resolution of the PRG Issue from the Comments

Harlen Ainscough indicated that the CDPHE was comfortable with the approach used to calculate the PRGs because it was conservative. The EPA toxicologist has determined that both methodologies presented at the September 6, 1994 team meeting are conservative and that the original methodology would be acceptable. The EPA is considering allowing the existing PRGs

if the IM/IRA-EA Decision Document is modified to clarify that the PRG calculation methodology is conservative but differs from the approach that has been taken for other OUs at the RFETS. The EPA will finalize this decision for the next team meeting.

7) Other Issues

Andy Ledford requested that the CDPHE clarify the question raised at the August 23, 1994 team meeting concerning the isotopic analysis of the sludge. Harlen Ainscough responded that the CDPHE had asked why the gross alpha/gross beta results did not appear to be consistent with the specific isotopic analyses. Steve Howard indicated that the gross screening was performed by Haliburton, and that the specific isotopic analyses were performed by Weston. Phil Nixon indicated that these data sets should not be compared because they were different samples taken at different times with different intended end uses. The only time that gross screening can be compared to specific analyses is when the results come from the same samples, and an evaluation is performed to see if the majority of the alpha or beta energy has been accounted for by the specific isotopes that were analyzed. This comparison can be useful to determine if other isotopes (not analyzed for) are contributing significantly to the gross energy. However, the comparison cannot be made between the Haliburton and Weston data because the samples were taken at different times. DOE will send a letter to CDPHE and EPA specifying the above information with respect to differences between the data sets.

Phil Nixon presented Harlen Ainscough with summary contaminant data tables, which the CDPHE could use to make the RESRAD model more accurate.

A handwritten signature in cursive script, reading "Philip A. Nixon", is written over a horizontal line.

Philip A. Nixon